

1 Carol A. Hewitt  
 2 LINDSAY, NAHSTOLL, HART, DUNCAN,  
 3 DAFOE & KRAUSE  
 4 1331 S. W. Broadway  
 5 Portland, Oregon 97201  
 6 Telephone: 503-226-1191

7 Attorneys for Plaintiffs

U. S. DISTRICT COURT  
 DISTRICT OF OREGON  
 FILED

JUL 3 1974

ROBERT M. CHRIST, Clerk  
 By *[Signature]* DEPUTY

8 IN THE UNITED STATES DISTRICT COURT  
 9 FOR THE DISTRICT OF OREGON

10 SANDY L. HENDERSON, ANNA MARGARET  
 11 WICKER, JANE GRAY, and CARMELLE L.  
 12 HARTIN,

13 Plaintiffs

14 vs.

15 THE STATE OF OREGON BY AND THROUGH  
 16 THE BUREAU OF LABOR AND THE DIVISION  
 17 OF HIGHER EDUCATION; NORMAN O. NILSEN,  
 18 COMMISSIONER OF LABOR; DR. ROY  
 19 LIEUALLAN, CHANCELLOR OF HIGHER  
 20 EDUCATION; and JOSEPH J. ADAMS,  
 21 HUGH MCKINLEY, CHALMERS L. JONES,  
 22 ROGER S. MEIER and EDWIN H. ARMSTRONG,  
 23 in their capacity as members of the  
 24 PUBLIC EMPLOYEES RETIREMENT BOARD.

25 Defendants

Civil Action No. 74-538  
 COMPLAINT

I.

22 This is an action for declaratory and injunctive relief  
 23 under Title VII of the Civil Rights Act of 1964, as amended,  
 24 (42 USC §2000 e, et seq) and 42 USC §1983.

II.

26 The Court has jurisdiction of this proceeding under

1 28 USC § 1343 and 42 USC §2000e.

2 III.

3 Plaintiffs are female employees of the State of Oregon  
4 between the ages of 25 and 53 years of age.

5 At all relevant times, Sandy Henderson and Anna  
6 Margaret Wicker have been employed by the State of Oregon through  
7 the Bureau of Labor and its Commissioner, Norman O. Nilsen, and  
8 Jane Gray and Carmelle L. Hartin have been employed by the State  
9 of Oregon through the Division of Higher Education and the  
10 Chancellor of Higher Education Dr. Roy Lieuallen.

11 IV.

12 The State of Oregon, the Bureau of Labor, Commissioner  
13 Norman O. Nilsen, the Division of Higher Education and Chancellor  
14 Roy Lieuallen are all employers within the meaning of 42 USC §2000e.

15 V.

16 Joseph J. Adams, Hugh McKinley, Chalmers L. Jones,  
17 Roger S. Meier and Edwin H. Armstrong have at all relevant times  
18 been members of the Public Employees' Retirement System Board  
19 of the State of Oregon which is charged by law with administering  
20 the Public Employees' Retirement System (hereinafter "Retirement  
21 System") as agent of the plaintiffs' employers named above.

22 VI.

23 The Bureau of Labor and the Division of Higher Education  
24 are public employers within the meaning of ORS 237.003 (7) and as  
25 such are employer members of the Retirement System.

26 As employer members of the Retirement System, the Bureau

1 of Labor and the Division of Higher Education have each periodically  
2 contributed such sums to the Retirement System fund as are actuarially  
3 computed to be such employers' share of the cost of providing  
4 retirement benefits to its employees.

5 VII.

6 As required by ORS 237.011, each plaintiff has at all  
7 relevant times been an employee member of the Retirement System.

8 As employee members of the Retirement System, each  
9 plaintiff has been required to contribute a certain percentage  
10 of her monthly salary to the Retirement System's fund.

11 VIII.

12 The contributions of employer and employee members of  
13 the Retirement System are maintained in a trust fund, and a  
14 separate account is maintained for each employee. At retirement,  
15 an employee receives monthly benefits payable from the trust  
16 fund. Such monthly benefits are greater for a male employee  
17 than for a female employee who has made the same contribution  
18 to and has the same account balance in the trust fund as the male  
19 employee.

20 IX.

21 This disparity in the payment of retirement benefits  
22 between female and male employees constitutes an unlawful  
23 employment practice within the meaning of 42 USC §2000e-2, and  
24 defendants should be enjoined from continuing the practice.

25 X.

26 Each of the plaintiff has filed with the Equal Employment

1 Opportunity Commission (EEOC) a charge of discrimination and has  
 2 received a "Right-to-Sue" letter from the EEOC authorizing the  
 3 commencement of a civil action under 42 USC §2000e-5. A copy  
 4 of each such charge and letter is attached hereto.

5 XI.

6 Plaintiffs are entitled by law to their costs and  
 7 reasonable attorneys fee.

8 WHEREFORE, plaintiffs pray for relief as follows:

9 1. For judgment declaring that defendants' practice  
 10 of paying higher monthly retirement benefits to male employees  
 11 than to female employees is an unlawful employment practice  
 12 under Title VII of the Civil Rights Act of 1964, as amended;

13 2. For injunction against such practice;

14 3. For costs and attorneys' fees;

15 4. For such other relief as the court deems proper.

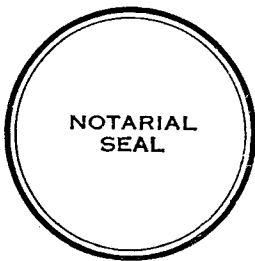
16 Dated this 3 day of July, 1974.

17 LINDSAY, NAHSTOLL, HART, DUNCAN,  
 18 DAFOE & KRAUSE

19 By Carol A. Hewitt  
 20 Carol A. Hewitt  
 21 Of attorneys for plaintiffs.  
 22  
 23  
 24  
 25  
 26

LINDSAY, NAHSTOLL, HART, DUNCAN, DAFOE & KRAUSE  
 ATTORNEYS AT LAW  
 1331 S.W. BROADWAY  
 PORTLAND, OREGON 97201  
 226-1191

STATE OF OREGON,

County of Multnomah }  
I, Carol A. Hewittbeing first duly sworn, say that I am the attorney for the plaintiffs  
in the within entitled suit  
and that the foregoing complaint is true as I verily believe

Subscribed and sworn to before me this 3rd day of July, 1974

 Shirley K. Johansen  
 Notary Public for Oregon.  
 My Commission expires 6/5/78

STATE OF OREGON,

County of } ss.

I hereby certify that I have prepared the foregoing copy of  
 and have carefully compared the same with the original thereof; and that it is a correct copy therefrom and of the whole thereof.  
 That the said in my opinion is well founded in law.

Dated, 19

Attorney for

STATE OF OREGON,

County of } ss.

Due service of the within  
 is hereby accepted in County, this day of  
 19, by receiving a copy thereof, duly certified to as such by  
 of Attorneys for

Attorney for

No.	In the Court OF THE STATE OF OREGON	FOR COUNTY	Plaintiff	vs.	Defendant	LINDSAY, NAHSTOLL, HART, DUNCAN, DAFOE & KRAUSE THE CARRIAGE HOUSE 1331 S.W. BROADWAY PORTLAND, OREGON 97201 226-1191	Attorney for
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I hereby certify that I served the foregoing on  
 , attorney for on the  
 day of 19, by mailing to him a true and correct copy thereof, certified by me as such.  
 I further certify that said copy was placed in a sealed envelope addressed to the said attorney at  
 , which is his regular office address, or his address as last given by him on a document which  
 he has filed in the above entitled cause and served on me; said sealed envelope was then deposited in the United States post office  
 at , Oregon, on the day last above mentioned, with the postage thereon fully paid.

Attorney for



UNITED STATES DEPARTMENT OF JUSTICE

WASHINGTON, D.C. 20530

Address Reply to the  
Division Indicated  
and Refer to Initials and Number

NOTICE OF RIGHT TO SUE  
WITHIN 90 DAYS

JSP:HAG:tbq

APR 24 1974

AIR MAIL

Ms. Sandy L. Henderson  
c/o Carol Ann Hewitt, Esquire  
1331 S. W. Broadway  
Portland, Oregon 97201

Re: EEOC Charge Against State of Oregon  
and Oregon Public Employees Retirement Board  
TSE 4-1071

Dear Ms. Henderson:

Because you filed the above charge with the Equal Employment Opportunity Commission, and the Commission has determined that it will not be able to investigate and conciliate that charge within 180 days of the date the Commission assumed jurisdiction over the charge, and this Department has determined that it will not file any lawsuit based upon that charge within that time, and because you through your attorney have specifically requested this Notice, you are hereby notified that you have the right to institute a civil action under Title VII of the Civil Rights Act of 1964, as amended, 42 U.S.C. 2000e, et seq., against the above named respondents.

If you choose to commence a civil action, such suit must be filed in the appropriate United States District Court within 90 days of your receipt of this Notice.

- 2 -

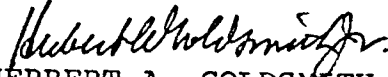
Your attorney may inspect the investigative file pertaining to the case at a time and place convenient to the parties. That file is located in the EEOC District Office, at 414 Olive Way, 4th Floor, Seattle, Washington 98101.

We request that you send this Department a copy of any complaint initiating suit.

This Notice should not be taken to mean that an agency of the United States has made a judgment as to whether or not your charge is meritorious.

Sincerely,

J. STANLEY POTTINGER  
Assistant Attorney General  
Civil Rights Division

By:   
HERBERT A. GOLDSMITH, JR.  
Attorney  
Employment Section

cc: Mr. Robert Jeffrey, Director  
Seattle District Office  
Equal Employment Opportunity  
Commission  
414 Olive Way, 4th Floor  
Seattle, Washington 98101

## CHARGE OF DISCRIMINATION

(If you have a complaint, fill in this form and mail it to the Equal Employment Opportunity Commission's Regional Office in your area. In most cases, a charge must be filed with the EEOC within a specified time after the discriminatory act took place. IT IS THEREFORE IMPORTANT TO FILE YOUR CHARGE AS SOON AS POSSIBLE.)

This form is to be used only to file a charge of discrimination based on RACE, COLOR, RELIGION, SEX, or NATIONAL ORIGIN.

Case File No. \_\_\_\_\_

(PLEASE PRINT OR TYPE)

1 Your Name (Mr., Mrs., Miss) Mrs. Sandy L. Henderson indicate Phone Number 344-2101

Street Address 1450 SW Taylor's Ferry Rd.City PortlandState OregonZip Code 97219

2 WAS THE DISCRIMINATION BECAUSE OF: (Please check one)

Race or Color ☐Religious Creed ☐National Origin ☐Sex ☒

3 Who discriminated against you? Give the name and address of the employer, labor organization, employment agency and/or apprenticeship committee. If more than one, list all.

Name State of OregonStreet address State CapitolCity SalemState Oregon

Zip Code \_\_\_\_\_

AND (other parties if any) and the Oregon Public Employees Retirement Board, 1450 SW Taylor's Ferry Rd., Portland, Oregon

4 Have you filed this charge with a state or local government agency?

Yes ☒

When

Nov

DAY

73No ☐

5 If your charge is against a company or a union, how many employees or members?

Under 25 ☐Over 25 ☒

6 The most recent date on which this discrimination took place: Month Continuing Day \_\_\_\_\_ Year \_\_\_\_\_

7 Explain what unfair thing was done to you. How were other persons treated differently? (Use extra sheet if necessary.)

The Gov. State of Oregon and the Oregon Public Employees Retirement Board discriminate against women by using sex-based annuity tables to compute monthly retirement benefits. Under this compulsory system, women and men contribute equally to the fund, but women automatically earn lower benefits per month after retirement from what they have contributed during employment. The Oregon Public Employees Retirement Board also offers a supplementary and voluntary Variable Annuity Program, in which women also earn less simply because they are female. A person's sex is the sole factor on which these disparities are based.

As an employee of the State of Oregon, I charge the State of Oregon and the Oregon Public Employees Retirement Board with sex discrimination, on behalf of myself and others similarly situated.

8 I swear or affirm that I have read the above charge and that it is true to the best of my knowledge, information and belief.

Date Nov 1, 1973Sandy L. Henderson

(Sign your name)

Subscribed and sworn to before me this 1st

day of

November196 73Linda Baggett

(Name)

Notary Public - Com-10-4-75

(Title)

If it is difficult for you to get a Notary Public to sign this, sign your own name and mail to the Regional Office. The Commission will help you to get the form sworn to.





UNITED STATES DEPARTMENT OF JUSTICE

WASHINGTON, D.C. 20530

Address Reply to the  
Division Indicated  
and Refer to Initials and Number

NOTICE OF RIGHT TO SUE  
WITHIN 90 DAYS

JSP:HAG:tbq

APR 24 1974

AIR MAIL

Ms. Carmelle L. Hartin  
c/o Carol Ann Hewitt, Esquire  
1331 S. W. Broadway  
Portland, Oregon 97201

Re: EEOC Charge Against State of Oregon  
and Oregon Public Employees Retirement Board  
TSE 4-1072

Dear Ms. Hartin:

Because you filed the above charge with the Equal Employment Opportunity Commission, and the Commission has determined that it will not be able to investigate and conciliate that charge within 180 days of the date the Commission assumed jurisdiction over the charge, and this Department has determined that it will not file any lawsuit based upon that charge within that time, and because you through your attorney have specifically requested this Notice, you are hereby notified that you have the right to institute a civil action under Title VII of the Civil Rights Act of 1964, as amended, 42 U.S.C. 2000e, et seq., against the above named respondents.

If you choose to commence a civil action, such suit must be filed in the appropriate United States District Court within 90 days of your receipt of this Notice.

- 2 -

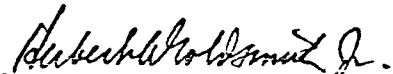
Your attorney may inspect the investigative file pertaining to the case at a time and place convenient to the parties. That file is located in the EEOC District Office, at 414 Olive Way, 4th Floor, Seattle, Washington 98101.

We request that you send this Department a copy of any complaint initiating suit.

This Notice should not be taken to mean that an agency of the United States has made a judgment as to whether or not your charge is meritorious.

Sincerely,

J. STANLEY POTTINGER  
Assistant Attorney General  
Civil Rights Division

By:   
HERBERT A. GOLDSMITH, JR.  
Attorney  
Employment Section

cc: Mr. Robert Jeffrey, Director  
Seattle District Office  
Equal Employment Opportunity  
Commission  
414 Olive Way, 4th Floor  
Seattle, Washington 98101

If you have a complaint, fill in this form and mail it to the Equal Employment Opportunity Commission's Regional Office in your area. In most cases, a charge must be filed with the EEOC within a specified time after the discriminatory act took place. IT IS THEREFORE IMPORTANT TO FILE YOUR CHARGE AS SOON AS POSSIBLE.

This form is to be used only to file a charge of discrimination based on RACE, COLOR, RELIGION, SEX, or NATIONAL ORIGIN.

Case File No. \_\_\_\_\_

(PLEASE PRINT OR TYPE)

1 Your Name (Mr., Mrs., Miss) Ms. Carmelle L. Hartin indicate Phone Number none

Street Address B.B. Rt. Box 421  
City Cottage Grove State Oregon Zip Code 97424

2 WAS THE DISCRIMINATION BECAUSE OF: (Please check one)

Race or Color ☐ Religious Creed ☐ National Origin ☐ Sex ☒

3 Who discriminated against you? Give the name and address of the employer, labor organization, employment agency and/or apprenticeship committee. If more than one, list all.

Name State of Oregon and the Oregon Public Employees Retirement Board  
Street address 1400 S.W. 5th Avenue, Room 669  
City Portland State Oregon Zip Code 97201

AND (other parties if any) \_\_\_\_\_

4 Have you filed this charge with a state or local government agency?

Yes ☒ When Oct. 23 1973 No ☐  
MONTH DAY YEAR

5 If your charge is against a company or a union, how many employees or members?

Under 25 ☐ Over 25 ☒

6 The most recent date on which this discrimination took place: Month Discrimination continuing Day \_\_\_\_\_ Year \_\_\_\_\_

7 Explain what unfair thing was done to you. How were other persons treated differently? (Use extra sheet if necessary.)

The State of Oregon and the Oregon Public Employees Retirement Board discriminate against women by using sex-based annuity tables to compute monthly retirement benefits. Under this compulsory system, women and men contribute equally to the fund, but women automatically earn lower benefits per month after retirement from what they have contributed during employment. The Oregon Public Employees Retirement System also offers a supplementary and voluntary Variable Annuity Program, in which women also earn less returns simply because they are female. A person's sex is the sole factor on which these disparities are based.

As an employee of the State of Oregon, I charge the State of Oregon and the Oregon Public Employees Retirement Board with sex discrimination on behalf of myself and all other female participants therein.

8 I swear or affirm that I have read the above charge and that it is true to the best of my knowledge, information and belief.

Date 10/25/73 Carmelle L. Hartin  
(Sign your name)

Subscribed and sworn to before me this 25<sup>th</sup> day of October 1973

Maureen Maureen  
(Name)

NOTARY PUBLIC FOR OREGON

MY COMMISSION EXPIRES 8-13-76

If it is difficult for you to get a Notary Public to sign this, sign your own name and mail to the Regional Office. The Commission will help you to get the form sworn to.



UNITED STATES DEPARTMENT OF JUSTICE

WASHINGTON, D.C. 20530

Address Reply to the  
Division Indicated  
and Refer to Initials and Number

NOTICE OF RIGHT TO SUE  
WITHIN 90 DAYS

JSP:HAG:tbg

APR 24 1974

AIR MAIL

Ms. Jane Gray  
c/o Carol Ann Hewitt, Esquire  
1331 S. W. Broadway  
Portland, Oregon 97201

Re: EEOC Charge Against State of Oregon  
and Oregon Public Employees Retirement Board  
TSE 4-1070

---

Dear Ms. Gray:

Because you filed the above charge with the Equal Employment Opportunity Commission, and the Commission has determined that it will not be able to investigate and conciliate that charge within 180 days of the date the Commission assumed jurisdiction over the charge, and this Department has determined that it will not file any lawsuit based upon that charge within that time, and because you through your attorney have specifically requested this Notice, you are hereby notified that you have the right to institute a civil action under Title VII of the Civil Rights Act of 1964, as amended, 42 U.S.C. 2000e, et seq., against the above named respondents.

If you choose to commence a civil action, such suit must be filed in the appropriate United States District Court within 90 days of your receipt of this Notice.

- 2 -

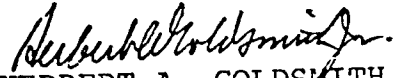
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We request that you send this Department a copy of any complaint initiating suit.

This Notice should not be taken to mean that an agency of the United States has made a judgment as to whether or not your charge is meritorious.

Sincerely,

J. STANLEY POTTINGER  
Assistant Attorney General  
Civil Rights Division

By:   
HERBERT A. GOLDSMITH, JR.  
Attorney  
Employment Section

cc: Mr. Robert Jeffrey, Director  
Seattle District Office  
Equal Employment Opportunity  
Commission  
414 Olive Way, 4th Floor  
Seattle, Washington 98101

If you have a complaint, fill in this form and mail it to the Equal Employment Opportunity Commission's Regional Office in your area. In most cases, a charge must be filed with the EEOC within a specified time after the discriminatory act took place. IT IS THEREFORE IMPORTANT TO FILE YOUR CHARGE AS SOON AS POSSIBLE.

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Case File No. \_\_\_\_\_

(PLEASE PRINT OR TYPE)

1 Your Name (Mr., Mrs., Miss) Ms. Jane Gray (Jacobson) Phone Number none  
indicate

Street Address Museum of Natural History, University of Oregon  
 City Eugene State Oregon Zip Code 97403

2 WAS THE DISCRIMINATION BECAUSE OF: (Please check one)

Race or Color ☐ Religious Creed ☐ National Origin ☐ Sex ☒

3 Who discriminated against you? Give the name and address of the employer, labor organization, employment agency and/or apprenticeship committee. If more than one, list all.

Name State of Oregon and the Oregon Public Employees Retirement Board  
 Street address 1400 S.W. 5th Avenue, Room 669  
 City Portland State Oregon Zip Code 97201

AND (other parties if any) \_\_\_\_\_

4 Have you filed this charge with a state or local government agency?

Yes ☒ When Oct. 23 1973 No ☐  
MONTH DAY YEAR

5 If your charge is against a company or a union, how many employees or members?

Under 25 ☐ Over 25 ☒

6 The most recent date on which this discrimination took place: Month \_\_\_\_\_ Discrimination continuing  
 Day \_\_\_\_\_ Year \_\_\_\_\_

7 Explain what unfair thing was done to you. How were other persons treated differently? (Use extra sheet if necessary.)

The State of Oregon and the Oregon Public Employees Retirement Board discriminate against women by using sex-based annuity tables to compute monthly retirement benefits. Under this compulsory system, women and men contribute equally to the fund, but women automatically earn lower benefits per month after retirement from what they have contributed during employment. The Oregon Public Employees Retirement System also offers a supplementary and voluntary Variable Annuity Program, in which women also earn less returns simply because they are female. A person's sex is the sole factor on which these disparities are based.

As an employee of the State of Oregon, I charge the State of Oregon and the Oregon Public Employees Retirement Board with sex discrimination on behalf of myself and all other female participants therein.

8 I swear or affirm that I have read the above charge and that it is true to the best of my knowledge, information and belief.

Date 10/25/1973  
 Subscribed and sworn to before me this 25<sup>th</sup> day of October 1973  
Marilyn Muehler (Name)

NOTARY PUBLIC FOR OREGON  
 MY COMMISSION EXPIRES 2-13-76

If it is difficult for you to get a Notary Public to sign this, sign your own name and mail to the Regional Office. The Commission will help you to get the form sworn to.



UNITED STATES DEPARTMENT OF JUSTICE

WASHINGTON, D.C. 20530

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NOTICE OF RIGHT TO SUE  
WITHIN 90 DAYS

JSP:HAG:tbg

APR 24 1974

AIR MAIL

Ms. Anna Margaret Wicker  
c/o Carol Ann Hewitt, Esquire  
1331 S. W. Broadway  
Portland, Oregon 97201

Re: EEOC Charge Against State of Oregon  
and Oregon Public Employees Retirement Board  
TSE 4-1069

---

Dear Ms. Wicker:

Because you filed the above charge with the Equal Employment Opportunity Commission, and the Commission has determined that it will not be able to investigate and conciliate that charge within 180 days of the date the Commission assumed jurisdiction over the charge, and this Department has determined that it will not file any lawsuit based upon that charge within that time, and because you through your attorney have specifically requested this Notice, you are hereby notified that you have the right to institute a civil action under Title VII of the Civil Rights Act of 1964, as amended, 42 U.S.C. 2000e, et seq., against the above named respondents.

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Sincerely,

J. STANLEY POTTINGER  
Assistant Attorney General  
Civil Rights Division

By:



HERBERT A. GOLDSMITH, JR.  
Attorney  
Employment Section

cc: Mr. Robert Jeffrey, Director  
Seattle District Office  
Equal Employment Opportunity  
Commission  
414 Olive Way, 4th Floor  
Seattle, Washington 98101



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This form is to be used only to file a charge of discrimination based on RACE, COLOR, RELIGION, SEX, or NATIONAL ORIGIN.

Case File No. \_\_\_\_\_

(PLEASE PRINT OR TYPE)

1 Your Name (Mr., Mrs., Miss) Anna Margaret Wicker Phone Number 229-5741  
indicate  
 Street Address 4422 N. E 82nd Ave  
 City Portland State Oregon Zip Code 97228

2 WAS THE DISCRIMINATION BECAUSE OF: (Please check one)

Race or Color ☐ Religious Creed ☐ National Origin ☐ Sex ☒

3 Who discriminated against you? Give the name and address of the employer, labor organization, employment agency and/or apprenticeship committee. If more than one, list all.

Name State of Oregon

Street address \_\_\_\_\_

City \_\_\_\_\_ State \_\_\_\_\_ Zip Code \_\_\_\_\_

AND (other parties if any) Oregon Public Employees Retirement Board

4 Have you filed this charge with a state or local government agency?

Yes ☒

When

Nov. 1 73  
MONTH DAY YEAR

No ☐

5 If your charge is against a company or a union, how many employees or members?

Under 25 ☐ Over 25 ☐

6 The most recent date on which this discrimination took place: Month Every Pay Day Period Year 1973

7 Explain what unfair thing was done to you. How were other persons treated differently? (Use extra sheet if necessary.)

The Oregon State Employees Retirement System discriminates against women by using sex based annuity tables to compute monthly retirement benefits. Under this compulsory system, women and men contribute equally to the fund, but women automatically earn lower benefits per month after retirement from what they have contributed during employment. The Oregon Public Employees Retirement System also offers supplementary and voluntary variable annuity programs in which women also earn less returns simply because they are females. A person's sex is the sole factor on which these disparities are based.

For the above reasons I charge the State of Oregon and Oregon Public Employees Retirement Board with sex discrimination on behalf of myself and all other female participants therein.

8 I swear or affirm that I have read the above charge and that it is true to the best of my knowledge, information and belief.

Date Nov. 1 1973 Anna Margaret Wicker  
(Sign your name)

Subscribed and sworn to before me this 1st day of November 1973

John D. [Signature] Notary - 10-4-75  
(Name) (Title)

If it is difficult for you to get a Notary Public to sign this, sign your own name and mail to the Regional Office. The Commission will help you to get the form sworn to.